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9 THE BURLINGTON INSURANCE COMPANY
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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

11 THE BURLINGTON INSURANCE) Case No.: 3:05-cv-05336-SC
12 COMPANY)
13 Plaintiff,)
14 v.)
15 NAUTILUS INSURANCE COMPANY;)
16 MONTICELLO INSURANCE COMPANY;)
17 LINCOLN GENERAL INSURANCE)
18 COMPANY; AND DOES 1 THROUGH 100,)
Defendant(s).)

19 Plaintiff THE BURLINGTON INSURANCE COMPANY (“Burlington”) and defendants
20 LINCOLN GENERAL INSURANCE COMPANY (“Lincoln General”) and NAUTILUS
21 INSURANCE COMPANY (“Nautilus”), through their respective counsel, HEREBY
22 STIPULATE AS FOLLOWS:

23 1. This action arises from a pending California state court case, entitled *Trammell, et*
24 *al. v. Amin, et al.* (San Francisco Superior Court Case No. 04 428084) (hereinafter referred to as
25 “Underlying Action”), in which a class of present and former tenants sued the owners of the
26 Baldwin House Hotel located in San Francisco.

27 2. The instant matter arises from commercial general liability insurance coverage
28 disputes among the insurers and their insureds as to responsibility for and allocation of certain

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1 costs for the defense of the Underlying Action as well as indemnity that may be paid to settle that
2 action.

3 3. Northfield Insurance Company (“Northfield”) and Penn American Insurance
4 Company (“Penn American”) issued commercial general liability insurance policies to the
5 insured defendants in the Underlying Action. The parties were not made aware of these policies
6 issued by Northfield until after the commencement of this action.

7 4. Coverage issues currently exist by and among Burlington, Lincoln General,
8 Northfield, Penn American, and the defendants in the underlying action – Chandrakant Amin,
9 Manharbhai Amin, Tara Amin, and Laxmiben Amin.

10 5. Therefore, the parties request that this Court permit Burlington to file the
11 Amended Complaint attached hereto as Exhibit A.

12 IT IS SO STIPULATED.

DATED: June 30, 2006

LHB PACIFIC LAW PARTNERS, LLP

~~DAVID B. DEMO~~
~~Attorney for Plaintiff~~
~~THE BURLINGTON INSURANCE COMPANY~~

DATED: June , 2006

BURNHAM & BROWN

CLARK J. BURNHAM
Attorney for Defendant
LINCOLN GENERAL INSURANCE COMPANY

DATED: June , 2006

BOLENDER & ASSOCIATES

JEFFREY S. BOLENDER
Attorneys for Defendant
NAUTILUS INSURANCE COMPANY

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IT IS SO STIPULATED.

DATED: June , 2006

LHB PACIFIC LAW PARTNERS, LLP

DAVID B. DEMO
Attorney for Plaintiff
THE BURLINGTON INSURANCE COMPANY

DATED: June 16, 2006

BURNHAM & BROWN
burnham & brown
CLARK J. BURNHAM
Attorney for Defendant
LINCOLN GENERAL INSURANCE COMPANY

DATED: June ___, 2006

BOLENDER & ASSOCIATES

JEFFREY S. BOLENDER
Attorneys for Defendant
NAUTILUS INSURANCE COMPANY

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DATED: June , 2006

LHB PACIFIC LAW PARTNERS, LLP

DAVID B. DEMO
Attorney for Plaintiff
THE BURLINGTON INSURANCE COMPANY

DATED: June , 2006

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CLARK J. BURNHAM
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